

RE: MARCUS K GRAVES

) Case No. 19 B 25299  
)  
Debtor ) Chapter 13  
)  
) Judge: DONALD R CASSLING

**NOTICE OF MOTION**

MARCUS K GRAVES

CUTLER & ASSOC  
via Clerk's ECF noticing procedures

1477 CAMERON CT  
HOFFMAN ESTATES, IL  
60010

Please take notice that on October 24, 2019 at 10:00 am my designee or I will appear before the Honorable Judge DONALD R CASSLING at 219 South Dearborn Courtroom 619, Chicago, IL and present the motion set forth below.

I certify under penalty of perjury that this office caused a copy of this notice to be delivered to the person(s) named above by U.S. mail at 55 E Monroe St., Chicago, IL 60603 or by the methods indicated on October 04, 2019.

/s/ Tom Vaughn

**TRUSTEE'S MOTION TO OBJECT TO DISCHARGE**

Now comes Tom Vaughn, Trustee in the above entitled case and moves the Court to enter an order determining that debtor is not entitled to a discharge, stating as follows:

1. Debtor (s) filed the above-captioned Chapter 13 case on September 06, 2019.
2. The debtor(s) filed a previous Chapter 7 case, # 18-25226 filed on Sep 06, 2018, discharge having been issued on Mar 12, 2019.
3. Pursuant to 11 U.S.C. § 1328 (f), "the court shall not grant a discharge of all debts provided for in the plan or disallowed under section 502, if the debtor received a discharge--  
(1) in a case filed under chapter 7, 11, or 12 of this title during the 4-year period preceding the date of the order for relief under this chapter, or  
(2) in a case filed under chapter 13 of this title during the 2-year period preceding the date of such order."

WHEREFORE Trustee prays that the Court enter an order that the debtor or debtors are not entitled to a discharge.

Respectfully submitted,

TOM VAUGHN  
CHAPTER 13 TRUSTEE  
55 E. Monroe Street, Suite 3850  
Chicago, IL 60603  
(312) 294-5900

/s/ Tom Vaughn